## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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SHIVA STEIN,

Plaintiff, : Civ. No. 1:21-cv-05752-PAC

v.

U.S. CONCRETE, INC., MICHAEL D.
LUNDIN, SUSAN M. BALL, KURT M.
CELLAR, RAJAN C. PENKAR, RONNIE
PRUITT, THEODORE P. ROSSI, COLIN M.

SUTHERLAND,

Defendants. :

## NOTICE OF VOLUNTARY DISMISSAL

Notice is hereby given that pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Shiva Stein hereby voluntarily dismisses her individual claims in the above-captioned action (the "Action") with prejudice. Because this notice of dismissal is being filed with the Court before service by Defendants of either an answer or a motion for summary judgment, Plaintiff's dismissal of the Action is effective upon filing of this notice.

DATED: August 31, 2021 Respectfully submitted,

## **MELWANI & CHAN LLP**

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